REMARKS

This is intended as a full and complete response to the Office Action dated June 23, 2010, having a shortened statutory period for response set to expire on September 23, 2010. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1, 2, 4-13, and 15-20 are pending in the application. Claims 1, 2, 4-13, and 15-20 remain pending following entry of this response. Claim 12 has been amended.

Further, Applicants are not conceding in this application that those amended (or cancelled) claims are not patentable over the art cited by the Examiner, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the claimed subject matter. Applicants respectfully reserve the right to pursue these (pre-amended or cancelled claims) and other claims in one or more continuations and/or divisional patent applications.

Claim Objections

Claims 12, 13, 15, and 16 are objected to because of informalities. Claim 12 has been amended to correct the informality cited by the Examiner. Claims 13, 15 and 16 depend on claim 12. Applicants therefore respectfully request that the objection to claim 12, and the claims 13, 15, and 16 dependent thereon, is withdrawn.

Claim Rejections - 35 U.S.C. § 102

Claims 1, 2, 4-8, and 12-20 are rejected under 35 U.S.C. 102(e) as being anticipated by *Cragun et al.*, (US 2005/0125447 A1, hereinafter *Cragun*). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9

USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Cragun* does not disclose "each and every element as set forth in the claim". For example, *Cragun* does not disclose the limitations of generating a linking value identifying a portion of a set of data associated with annotation records, as recited in claim 1. The Examiner argues that *Cragun* discloses these limitations at ¶[0043-44]. However, the cited passage is in fact directed to nothing more than using primary keys to locate records within a database, as commonly known to those skilled in the art.

More specifically, *Cragun* teaches that "[t]he primary key for the row is retrieved...[i]nformation is retrieved, based on the primary key and the data source." See *Cragun* at ¶[0043-0044]. In *Cragun*, no data value is created for the relationship between a primary key and the row to which it refers. In stark contrast, claim 1 recites the limitations of generating a linking value identifying a portion of the set of data associated with an annotation record. Here, the linking value is an actual datum. In fact, claim 1 further recites the limitations of returning an annotation data structure comprising a field containing the linking value and a field containing the consolidated data. See Figures 4A-4B and the associated descriptions in the specification of the present invention. In sum, in *Cragun*, a primary key is merely used to locate data; whereas, in claim 1, a linking value is generated to indentify a portion of data associated with an annotation record.

As the foregoing illustrates, *Cragun* fails to teach or suggest each and every limitation recited in claim 1. Independent claim 12 recites similar limitations as claim 1. Therefore, the claims 1 and 12, and the claims dependent thereon, are in condition for allowance.

Claims 9-11 are rejected under 35 U.S.C. 102(e) and 35 U.S.C 102(a) as being anticipated by *Bays et al.*, (US 6,519,603, hereinafter *Bays*).

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051,

1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Bays* does not disclose "each and every element as set forth in the claim". For example, *Bays* does not disclose the limitations of consolidating annotation data contained in an annotation record, as recited of claim 9. The Examiner argues that *Bays* discloses these limitations at col. 11, lines 22-24. However, the cited passage discloses only that "[S]tructured Query Language (SQL) is an example of language that can be used to search for, and return the annotations." This portion of the cited reference simply fails to teach or suggest the specific limitations of consolidating annotation data contained in the annotation records. In fact, no portion of *Bays* teaches or suggests such a consolidation of any type of data. Therefore, the limitations of claim 9 cannot be properly mapped to *Bays* as the Examiner has argued.

As the foregoing illustrates, *Bays* fails to teach or suggest each and every limitation recited in claim 9. Therefore, claim 9, and the claims dependent thereon, are in condition for allowance.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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